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Comments: Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project (SGP), proposed at the headwaters of the South Fork Salmon River watershed. As proposed, this project represents unacceptable risks to Chinook salmon and bull trout, will negatively impact all forms of recreation within the area, and harms treaty reserved rights and interests of the Indigenous peoples of the area.

The SGP will have adverse effects on Chinook salmon and bull trout. Given the billions of dollars spent on Snake River salmon recovery, this project represents a severe risk and flies in the face of this investment and effort to restore these species to a sustainable population. Stream temperatures are predicted to be elevated for up to 100 years within the mine site boundary and the habitat for these sensitive species will be for the worse, not better, as a result of this project. In regards to anadromous fish populations protected under the Endangered Species Act (ESA). How is it legal to potentially approve a mining project that will directly impact or increase mortality rates of Federally Listed and protected species?

The proposed fish tunnel is highly experimental. It has only been tested on other species of salmon, not bull trout or Chinook, which is the population of fish that will need to use it for survival. What proof is there that the fish tunnel will work when the U.S. Fish and Wildlife Service produced a memo with doubts of its effectiveness?

As proposed, this project will result in the loss of over 120 acres of high-functioning wetlands. It will negatively impact the general water quality of streams found within the site from additional sedimentation and the potential release of additional contaminants mobilized by mining and construction.

Although Perpetua prefers to present the SGP as a 'restoration' project, it is a massive industrial mine that will leave the landscape unrecognizable and degraded for lifetimes to come through the creation of three open pits, the permanent storage of over 120 million tons of toxic mine tailings above previously undisturbed wetland habitat, and an expanded footprint that more than doubles the previous disturbance of the Stibnite mining district.

The effects of climate change will exacerbate the impacts the SGP will have on the environment and were inadequately incorporated into the SDEIS. While briefly acknowledged, the compounding impacts of a warming climate were not taken into consideration when predicting stream temperatures or other environmental impacts that are intrinsically linked to the climate.

Throughout the life of the mine, hazardous materials will be transported to the site through the communities of Valley County, but there are no risk analyses on local communities if a hazardous spill were to occur and the potential exposure of a hazardous spill is much larger than the SDEIS portrays and must be addressed by the Forest Service. Has the SDEIS considered the potential consequences to neighboring counties as transportation of hazardous materials leave Valley county? Many of Idaho's highways parallel rivers throughout the state. Each of these rivers should also be considered under the SDEIS.

As proposed, the SGP raises numerous concerns for rivers protected under the Wild and Scenic Rivers Act (WSRA). The project itself is located at the headwaters of the suitable South Salmon River, which feeds directly into the designated Main Salmon River. However, the scope of analysis does not include any potential impacts that extend downstream of the site boundary to review these sections of river. Additionally, Johnson Creek and Burntlog Creek, both eligible under the WSRA, will both face degradation and risk of a catastrophic toxic spill if this project moves forward.

The proposal of the new Burnt Log Route would push a new road into the Idaho Inventoried Roadless Area. These areas have specific rules to keep them much more pristine than the rest of the forest. This creates animal habitat that is protected from impacts of motorized vehicles. Johnson Creek would be a better alternative than the Burnt Log Route because the road bed is already in place and the engineering to prevent harmful erosion has already been mitigated. Avalanches, landslides, and other hazards may close the proposed route many times throughout the year. The South Fork Salmon River Road has protections to keep fuel trucks and other HAZMAT vehicles off the road. One of the main reasons this closure is in place is to protect fish populations. If an avalanche or other hazard happened on the Burnt Log Route, would Perpetua Resources be permitted to use South Fork of the Salmon River Road with it's current protections? This is a big concern if permitted. It could lead to unnecessary hazardous spills or cause vehicular accidents among public land users that would not otherwise exist due to the narrow nature of this road.

Recreation, is a very large economy in Idaho. Recreation, in any form, within the general area of the mine will be negatively impacted. The analysis of impacts on recreation is arbitrarily limited to a 5-mile radius from major mine features. Closures of public land near the entire Yellowpine region will directly impact fisherman, backcountry skiers and snowmobilers, hunters, kayakers, rafters, mountain bikers, hikers, and campers. Once mining closures go into effect for the area, all outdoor recreationists will not be permitted to utilize their public lands. This does not include any discussion of traffic displaced to the South Salmon Road and Lick Creek Road that will logically result from this project.

Why should this population of recreators lose out on the use of the lands that they are paying taxes to use?

Traffic through our communities is going to increase. It is probable that recreators will avoid Warm Lake Road/Johnson Creek Roads because of an increase in heavy equipment mining traffic and road closures. This means a larger volume of traffic will be routed through McCall and out Lick Creek Road. Increased traffic through the town of McCall will cause excessive wear and tear on the roads. Who will pay for the increase in repairs needed from a high volume of traffic? This will ultimately lead to more accidents within the community. Lick Creek Road is already busy on summer days. Traffic displaced from Warm Lake Rd. will clog trailheads, dispersed camping, and cause more erosion on roadways throughout the forest, another added cost at the taxpayers' expense.

The SGP will negatively impact the treaty-reserved rights of the Nez Perce and other indigenous peoples of Idaho. The SDEIS clearly states that "Adverse impacts to tribal rights and interests under either alternative, including preventing access to traditional lands, harming traditional fishing and hunting rights, impacting endangered salmon and concerns that it would harm the tribe's salmon restoration efforts".

Finally, a glaring oversight which will have detrimental effects on the area is the fact that the local school district is already at capacity. Further growth and the addition on the student population will fall directly on the school district, and in turn, the local taxpayer. The school district will also be required to provide infrastructure to instruct all school aged students that that may live in Yellowpine due to the mine. This will be a difficult task, considering McCall-Donnelly School District (MDSD) will have to provide staff, facilities, bus service, food, food service, and so on. This will be a direct loss to the district and tax payers. Perpetua Resources will not be required to help pay for these additional costs that burden the district.

On a personal note, the East Fork of the South Fork of the Salmon River (EFSFSR) and surrounding mountains are used year round by many groups. As a whitewater kayaker, this EFSF and the SFS regions are my two favorite places to paddle, camp, and experience all that Wild Idaho has to offer.

For these reasons, I urge the Forest Service to protect the Salmon River watershed and reject the proposed Stibnite mine plan.

Thank you,  
Nathan Todd